

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MATTHEW KUZMESKAS and BRETT
MESSIEH, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

QUANTSTAMP, INC., RICHARD MA, and
STEVEN STEWART,

Defendants.

Case No.: 1:20-cv-02813-LAP

Honorable Loretta A. Preska

**NOTICE OF MOTION TO DISMISS THE AMENDED CLASS ACTION COMPLAINT
ON BEHALF OF DEFENDANTS QUANTSTAMP, INC.,
RICHARD MA, AND STEVEN STEWART**

PLEASE TAKE NOTICE that, upon the Amended Class Action Complaint, filed September 11, 2020 (ECF No. 27); the Memorandum of Law, dated November 13, 2020, Declaration of Corey Worcester, dated November 13, 2020, and exhibit thereto, and upon all prior papers and proceedings herein, Defendants Quantstamp, Inc., Richard Ma, and Steven Stewart will move this Court, before the Honorable Loretta A. Preska, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and at a time designated by the Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), for an Order dismissing the Amended Class Action Complaint in its entirety with prejudice and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court-ordered briefing schedule (ECF No. 37) entered November 6, 2020, Plaintiffs' memorandum of law in opposition, if any, must be served on the undersigned counsel by January 11, 2021.

Dated: New York, New York
November 13, 2020

Respectfully submitted,

By: /s/ Corey Worcester

Corey Worcester

Jacob J. Waldman

Jesse Bernstein

**QUINN EMANUEL URQUHART
& SULLIVAN, LLP**

51 Madison Avenue, 22nd Floor

New York, NY 10010

Telephone: (212) 849-7000

coreyworcester@quinnemanuel.com

jacobwaldman@quinnemanuel.com

jessebernstein@quinnemanuel.com

Michael Liftik (admitted *pro hac vice*)

1300 I St. NW #900

Washington, DC 20005

(202) 538-8000

michaelliftik@quinnemanuel.com

*Attorneys for Defendants Quantstamp,
Inc., Richard Ma, and Steven Stewart*